

75. NewSouth uses the UNE-P to provide service to businesses of all sizes. NewSouth Comments at 2. NewSouth utilizes the LENS and EDI interfaces, which allows its UNE-P orders “to be provisioned and accurately completed in the significant majority of cases within two or three days.” Id. at 5. NewSouth concludes that “BellSouth’s current provision of access to access to unbundled loops, EELs, the UNE-Platform, local number portability, and interconnection, including collocation, is sufficient to provide NewSouth a meaningful opportunity to compete in Georgia and Louisiana.” Id. at 7.
76. BTI Telecom Corp. (“BTI”) states that “BellSouth’s OSS is largely mechanized and has seen steady improvement over time.” BTI Comments at 2. According to BTI, its “experience suggests that, for the most part, orders to BellSouth flow through with a minimum of manual intervention. BellSouth’s ability to handle orders that require manual intervention has also seen a steady improvement. While a fully mechanized OSS is a desirable goal, BellSouth’s mixed system appears to be capable of handling orders in commercially meaningful numbers.” Id. at 2. BTI concludes, quite candidly, that “[n]o one can reasonably expect a flawless system, but it is clear that BellSouth has paid substantial attention to developing both its OSS system and the personnel operating the system.” Id.
77. The Communications Workers of America (“CWA”) represents employees at BellSouth and at AT&T. Specifically, CWA represents the over 2,000 employees that work in the six centers that provide support for CLEC activities, including most of the support for the handling of orders that fall out of the mechanized systems and manually

submitted orders. CWA confirms that the staffing levels of front-line personnel working in these wholesale centers have increased to meet growing service demand. CWA Comments at 6. In addition, CWA also confirms that the training and hiring practices for these employees are at parity with those in BellSouth's retail units. Id.

XI. CONCLUSION

78. This affidavit has shown that BellSouth's OSS process large volumes of UNE orders (the great majority mechanically), are rarely out of service and are scalable to meet reasonably foreseeable future demand. BellSouth handles the relatively small percentage of LSRs that require manual processing in a timely fashion and with substantially the same accuracy as it handles such orders for its own retail operations. In this regard, BellSouth meets the requirements of the Act and provides the CLECs with a meaningful opportunity to compete.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.


Executed on November 12, 2001.

William N. Stacy

STATE OF
COUNTY OF

Subscribed and sworn to before me
this 12th day of November, 2001.

Ray P. Delf
Notary Public

 RAY P. DELF
NOTARY PUBLIC DEKALB COUNTY GEORGIA
MY COMMISSION EXPIRES FEBRUARY 10, 2003


I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed on November 12, 2001.



STATE OF
COUNTY OF


Subscribed and sworn to before me
this 12th day of November, 2001.


Notary Public

RAY P. DILL
NOTARY PUBLIC DEKALB COUNTY GEORGIA
MY COMMISSION EXPIRES FEBRUARY 14, 2003

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed on November 12 2001.

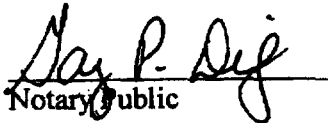

Ken L. Ainsworth

Director Interconnection Operations

STATE OF
COUNTY OF

Subscribed and sworn to before me

this 12th day of November, 2001.


Notary Public

RAY P. DELZ
NOTARY PUBLIC DEKALB COUNTY GEORGIA
MY COMMISSION EXPIRES FEBRUARY 16, 2003

Percent Manually Submitted Orders

State	% Orders Submitted Manually	Time Frame
BellSouth Regional	9.8	September, 2001
Texas	43.2	October 1999. ¹
Kansas	52.1	January 2000 to August 2000. ²
Oklahoma	74.3	January 2000 to August 2000. ³
Arkansas	27.7	January 2001 to June 2001. ⁴
Missouri	25.9	January 2001 to June 2001. ⁵

¹ Brief In Support of Application By Southwestern Bell For Provision of In-Region, Interlata Services In Texas at 24, *Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Texas*, Docket No. 00-65 (FCC filed January 10, 2000); Affidavit of Candy R. Conway Aff. ¶ 36, *Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Texas*, Docket No. 00-65 (FCC filed January 10, 2000).

² Joint Affidavit of J.Gary Smith & Mark Johnson at Attachment A, *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, Docket No. 00-217 (FCC filed October 26, 2000).

³ *Id.*

⁴ Affidavit of David R. Tebeau, Attachment A, *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Arkansas and Missouri*, Docket No. 01-194 (FCC filed August 20, 2001).

⁵ *Id.*

Reject Rates

BellSouth Georgia and Louisiana Application

BellSouth-Region (Mechanized and Partial Mechanized, excluding fatal rejects) (September)	Residential: 14.1 percent Business: 22.1 percent UNE: 20.0 percent
BellSouth-Region (Mechanized and Partial Mechanized, including fatal rejects) (September)	Residential: 17.9 percent Business: 25.8 percent UNE: 23.9 percent

Verizon Applications

Note: Verizon's measure reflects a ratio of orders rejected to orders confirmed. ¹ BellSouth has endeavored to control for that difference by restating Verizon's data. While that restatement is not perfect, if anything, it should <u>understate</u> Verizon's reject percentage as calculated under BellSouth's measure. ²	
New York (6/99-9/99) (NY 271 Order ¶ 175; Carrier to Carrier Reports)	UNE: 22.3 to 25.4 percent Resale: 19.0 to 23.4 percent
Massachusetts (9/00-12/00) (MA 271 Order ¶ 75)	UNE: 17.4 to 19.9 percent Resale: 30.5 to 32.9 percent

¹ For example, a CLEC order that is rejected the first and second time it is submitted, before being confirmed on the third submission, will show a 200% reject rate (two failures for 1 Purchase Order Number – "PON") instead of a 67% reject rate (two failures for three submissions). And if three other CLEC orders were submitted and confirmed, the reject rate would appear to be 50 percent (two rejects divided by four PONs), rather than 33 percent (two rejects divided by six LSRs submitted) or 25 percent (1 PON rejected of 4 LSRs submitted).

² The recalculation is performed by adding the number of rejects to the number of confirmed orders, which results in a close estimate of the number of LSRs (including re-submissions). By then dividing the number of rejects by the total number of LSRs, one can calculate a reject rate comparable to BellSouth's. Because, however, some orders may be rejected one or more times, but be abandoned without being confirmed, the total number of LSRs will be understated. Therefore, Verizon's actual reject rates calculated using BellSouth's methodology will be higher than the recalculated results presented here.

Pennsylvania (2/01-6/01) (PA 271 Order, App. B OR-3-01-2000, 3000)	UNE: 17.6 to 19.7 percent Resale: 26.6 to 28.8 percent
Connecticut (12/00-3/01) (CT 271 Order, App. C OR-3-01)	UNE: 19.3 to 42.7 percent Resale: 36.8 to 50.4 percent

SWBT Applications

Note: SWBT's percent rejects measure includes fatal rejects. (PM 9)	
Texas (10/99-12/99) (SWBT Ham Reply Aff. ¶ 90)	30.7 to 32.8 percent (EDI and LEX)
Kansas/Oklahoma (5/00-8/00) (SWBT Ham Aff. ¶ 196; SWBT Ham Reply Aff. ¶ 49)	25 to 31.6 percent (EDI and LEX region-wide)
Arkansas/Missouri (4/01-8/01) (AK/MO Order Apps. B&C, PM 9-01, 9-02) (CLEC aggregate resale & UNE)	AK: 27.27 to 33.9 percent (EDI) AK: 34.0 to 43.66 percent (LEX) MO: 26.67 to 31.15 percent (EDI) MO: 43.65 to 47.03 percent (LEX)

FOC/Reject Benchmarks

	Mechanized	Partially Mechanized	Manual
Georgia/ Louisiana	FOC: 95% within 3 hours Reject: 97% within 1 hour	FOC & Rejects: 85% within 10 hours	FOC: 85% within 36 hours Reject: 85% within 24 hours
Verizon States	95% within 2 hours	Orders < 10 lines: 95% within 24 (clock) hours Orders = 10 lines: 95% within 72 (clock) hours	[Verizon does not accept manually submitted orders for POTS < 10 lines]
SWBT States	FOC: 95% within 5 hours Reject: 97% within 1 hour	FOC: 95% within 5 hours Reject: 97% within 5 hours ¹	FOC: 95% within 24 hours Reject: no benchmark

Note: Hours are business hours unless otherwise noted.

¹ The reject timeliness benchmark for the Missouri/Arkansas application was changed to 97% within 6 hours.

Georgia Manually Handled FOC Performance

	<u>Partially Mechanized</u>	<u>Total Mechanized</u>		<u>Manual</u>		
May	% ≤ 10*	% ≤ 4	% ≤ 10	% ≤ 16	% ≤ 24	% ≤ 36*
Residence	90.35	93.58	98.78	93.07	96.42	97.45
Business	92.83	90.49	96.78	96.36	92.71	97.85
UNE-P	94.08	87.12	97.86	97.69	93.44	97.00

June

Residence	83.84	92.09	97.63	91.42	97.67	98.44
Business	89.75	78.01	95.89	93.00	96.50	98.50
UNE-P	89.00	81.83	96.11	90.83	98.13	98.99

July

Residence	83.11	87.27	97.00	86.96	90.22	91.30
Business	87.11	71.39	94.41	91.59	92.92	98.67
UNE-P	94.38	81.48	97.95	86.07	88.53	98.36

August

Residence	94.52	95.26	98.82	89.55	93.28	94.78
Business	92.39	89.70	96.19	93.58	97.51	98.93
UNE-P	97.99	92.95	99.27	98.37	99.29	99.90

September

Residence	91.88	94.63	98.80	95.50	97.73	97.75
Business	96.07	91.41	98.12	92.73	96.09	98.88
UNE-P	95.95	92.92	98.34	95.31	96.97	98.07

Source: Georgia SQM Detail Reports.

* Georgia Benchmarks

Georgia Manually Handled Reject Performance

May	<u>Partially Mechanized</u>		<u>Total Mechanized</u>	<u>Manual</u>	
	Avg. Time (hours)	% ≤ 10* (hours)	% ≤ 4 (hours)	Avg. Time (days)	% ≤ 24* (hours)
Residence	4.30	91.51	90.74	.31	99.23
Business	2.60	97.21	89.36	.25	98.54
UNE-P	4.17	95.46	80.90	.27	98.84

June

Residence	5.97	85.40	86.28	.36	99.07
Business	5.60	91.11	67.40	.29	98.25
UNE-P	3.74	94.19	75.98	.24	99.02

July

Residence	7.05	85.55	82.12	.53	94.94
Business	5.59	88.63	64.89	.25	97.06
UNE-P	4.88	94.12	68.44	.46	94.55

August

Residence	3.09	96.90	95.72	.23	97.50
Business	3.04	94.60	95.73	.19	97.95
UNE-P	2.43	97.49	90.43	.15	98.98

September

Residence	2.66	97.65	90.40	.23	97.50
Business	2.37	97.55	89.91	.20	99.42
UNE-P	3.30	95.51	87.00	.20	97.33

Source: Georgia SQM Detail Reports.

* Georgia Benchmarks

Regional Manually Handled FOC Performance

	Partially Mechanized	Total Mechanized			Manual	
May	% ≤ 10*	% ≤ 4	% ≤ 10	% ≤ 16	% ≤ 24	% ≤ 36*
Residence	90.66	95.35	98.54	90.51	96.31	98.00
Business	93.78	89.88	96.98	92.79	97.13	98.60
UNE-P	93.28	89.01	97.82	93.89	96.52	97.08

June

Residence	82.60	89.73	96.93	90.03	96.55	98.08
Business	90.86	74.68	95.55	94.04	97.68	99.09
UNE-P	88.20	80.32	95.75	94.01	98.85	99.53

July

Residence	81.91	87.21	96.73	91.08	95.83	96.99
Business	91.08	69.39	95.34	91.97	96.38	98.90
UNE-P	92.46	77.39	96.93	96.50	97.86	99.17

August

Residence	95.65	95.44	99.14	95.61	97.04	98.38
Business	94.88	90.56	97.60	94.46	97.62	99.05
UNE-P	96.15	91.81	98.63	97.71	98.35	99.39

September

Residence	95.61	95.10	99.31	94.88	97.39	98.33
Business	95.64	90.67	98.03	92.00	95.52	98.08
UNE-P	95.80	93.26	98.33	95.37	97.02	97.97

Source: Georgia SQM Detail Reports.

* Georgia Benchmarks

Regional Manually Handled Reject Performance

May	<u>Partially Mechanized</u>		<u>Total Mechanized</u>	<u>Manual</u>	
	Avg. Time (hours)	% ≤ 10* (hours)	% ≤ 4 (hours)	Avg. Time (days)	% ≤ 24* (hours)
Residence	3.74	90.85	90.81	.36	96.90
Business	2.91	96.12	89.50	.29	97.38
UNE-P	3.68	95.60	84.54	.29	97.70

June

Residence	6.63	81.98	79.65	.38	98.22
Business	5.03	92.49	70.02	.29	99.13
UNE-P	4.38	92.35	72.73	.26	98.92

July

Residence	6.25	86.53	77.80	.76	97.51
Business	5.35	92.22	65.96	.24	97.29
UNE-P	4.96	93.80	65.69	.18	98.57

August

Residence	3.06	96.75	95.09	.20	98.37
Business	2.96	95.66	94.97	.18	98.59
UNE-P	2.30	97.81	92.93	.15	99.05

September

Residence	3.06	97.09	88.88	.22	98.57
Business	2.40	96.40	89.13	.20	98.44
UNE-P	2.74	96.46	89.50	.22	97.00

Source: Georgia SQM Detail Reports.

* Georgia Benchmarks

Florida OS Case Explorer Review-11/9/11

Issue	Commercial Volumes	Small Issues	Real Issues
Documentation/Processes		6, 35, 62, 82, 103, 106, 110, 111	49, 88
Performance/Results			
POP	12, 51, 54, 72, 76, 84, 85, 86, 87, 90, 100, 105, 107, 112, 116, 117, 118, 121		
M&R	38		
BLG	13, 43, 44, 60, 83, 96		
Functionality Issues		16, 42, 63, 74, 98, 102	
Metrics	10, 22, 27, 36, 101, 109, 113, 114, 119, 120, 122		

ORDER MANAGEMENT					
TVV1 - POP Functional Eval.	90%	44	30	14	16,42,49,51,54,74,85,87,90,98,100,102,105,117
TVV2 - POP Volume Performance	77%	7	2	5	72,99,107,116,118
TVV3 - Flow-Through	82%	4	1	3	86,121,122
PPR7 - POP Manual Processing	92%	1	0	1	94
PPR8 - Work Center/Help Desk	91%	4	2	2	103,110
OM TOTAL	87%	60	35	25	

REPAIR, PROVISIONING & MAINTENANCE					
TVV4 - Prov. Verification & Validation	74%	4	0	4	76,82,84,112
TVV5 - M&R TAFI Functional Eval	100%				
TVV6 - M&R ECTA Functional Eval	76%				
TVV7 - M&R TAFI Performance Eval	100%				
TVV8- M&R ECTA Performance Eval	78%	2	0	2	38,63
TVV9 - End-End Trouble Reporting Process	100%				
PPR6 - Collocation & Network Design	89%				
PPR9 - Provisioning Process	80%	1	1	0	
PPR14 - End-End M&R Process	81%	1	0	1	35
PPR15 - M&R Work Center Support	100%				
PPR16 - Network Surveillance Support	100%	1	1	0	
RPM TOTAL	89%	9	2	7	

BILLING					
TVV10 - Functional Usage Test	73%	6	4	2	13,83
TVV11 - Functional Carrier Bill Eval	82%	7	1	6	43,44,60,62,96,111
PPR10 - Billing Work Center/Help Desk	72%	1	1	0	
PPR12 - Daily Usage Production & Distribution	90%	0	0	0	
PPR13 - Bill Production & Distribution	95%	0	0	0	
BLG TOTAL	82%	14	6	8	

RELATIONSHIP MANAGEMENT INFRASTRUCTURE					
PPR1 - Change Management	74%	6	3	3	12,88,106
PPR2 - Account Management	56%	4	4	0	
PPR3 - OSS Interface Help Desk	86%				
PPR4 - CLEC Training	96%	1	1	0	
PPR5 - OSS Interface Development	73%	8	7	1	6
RMI TOTAL	77%	19	15	4	

METRICS					
PMR1 - Data Collection & Storage	85%	1	1	0	
PMR2 - Definitions/Standards V&V Review	65%	2	2	0	
PMR3 - Metrics Change Management V&V Review	78%	2	1	1	119
PMR4 - Data Integrity V&V Review	42%	4	0	4	36,113,114,120
PMR5 - Metrics Calculation V&V Review	70%	11	6	5	10,22,27,101,109
METRICS TOTAL	68%	20	10	10	

FLORIDA OSS TEST TOTAL	81%	122	68	54	
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Exception	Issue
6	BellSouth lacks an appropriate process, methodology and robust test environment for testing of the electronic data interchange (EDI) interface. BellSouth was able to resolve all but one of KPMG's issues on the EDI test environment in this exception with existing documentation. The last item is a change to the CLEC Change Control document in Appendix D where BellSouth and the CLECs are adding verbiage to address how long new entrant testing is supported in an old EDI map after a new map is introduced. This should be resolved at the next CLEC Change Control meeting.
35	BellSouth processes for responding to customer requests for earlier appointments in the CWINS Center differ from those in the small business telecommunications center resulting in a disparity in service between wholesale and retail. The "TAFI Small Business Commitments" job aid for the CWINS has been updated for further clarification to include a shorter commitment (4 hour allowance) than TAFI is recommending, when a field dispatch is not required. During the retest, KPMG found the CWINS Center to be in compliance with their procedures when a customer requests a better commitment time. The retail complex Business Repair Center was also visited and found to not be in compliance with the same process that wholesale uses. The retail issue has been corrected and KPMG is retesting.
49	UNE loop CLEC to CLEC migrations - BellSouth has provided a process for this type of transaction, which is currently being tested by KPMG and is available to CLECs through their account teams.
62	KPMG found that a rate for a service order mechanized charge was inconsistent with the rate contained in their Interconnection Agreement (IA) – The IA actually contained two differing rates for the charge. An amended IA was executed with KPMG to remove the incorrect rate and resolve the issue.
82	BellSouth's systems have not updated the directory listing databases on the completion date of the completion notice. (TVV4) BellSouth appropriately updated directory assistance databases for each of the items listed in this exception utilizing a batch process. KPMG's expectation conflicts with the process used by BellSouth to update the directory assistance database for all customers. BellSouth has subsequently provided KPMG a copy of the batches for to substantiate parity in the process. KPMG is reviewing BellSouth's response and the data provided.
88	BellSouth's Change Control Prioritization Process does not allow for CLECs to be involved in the prioritization of all CLEC impacting change requests - In an effort to address CLEC and KPMG concerns in CCP about release resource planning, BellSouth is offering the following proposal: BellSouth will allocate 40% of its annual releases' capacity for implementing CLEC change requests and/or CLEC-driven mandates. The remaining 60% will be used for implementing public switched network mandates such as NPA overlays and Number Pooling (5-10%), defects and maintenance (approximately 25%), and the remaining 25-30% for BellSouth features and change requests. This allocates more release capacity to CLEC requests including CLEC-driven mandates, such as TN validation, than to BellSouth requests. BellSouth will provide units as small, medium and large preliminary estimates accompanying each change request for prioritization. BellSouth will also track the capacity per the above categories and provide a YTD percent capacity used for CLEC requests. This report will be provided at CCP on a quarterly basis, beginning with calendar year 2002.

Documentation processes	
Exception	Issue
103	BellSouth does not have documented guidelines for CLEC interaction with the local carrier service center (LCSC) Fleming Island call center. (PPR8) BellSouth does have documented processes for service representatives in the Fleming Island LCSC regarding CLEC interaction. BellSouth will update internal Methods and Procedures documentation to address the process for handling CLEC calls in the Fleming Island LCSC due to a BellSouth systemic problem. In addition, the LCSC Contact page on BellSouth's Interconnection web site for CLECs will be updated to address the call handling process by November 30, 2001.
106	The BellSouth IT Team does not have criteria to develop the scope of a Release Package (PPR1). BellSouth submitted to KPMG its strategies for scope development of release packages in the "Encore Electronic Interface Ordering (EIO) Application Rolling Release Plan" and the Release Scoping Plan that explains the strategies, methods, or procedures for developing release packages to resolve this issue.
110	BellSouth does not have adequate guidelines for call tracking and resolution at its Local Carrier Service Center (LCSC). (PPR-8) BellSouth will update LCSC methods and procedures to include a process for noting relevant ordering information discussed with a CLEC. The information will be readily available to other LCSC representatives if the CLEC should recall BellSouth to discuss the issue. KPMG will retest the November 30, 2001 implementation of the updated methods and procedures.
111	BellSouth's policy of retaining resale call detail for thirty (30) days after the bill period date is inadequate for bill reconciliation and claims investigation. (TVV-11). The retention of call detail for calls billed on resale invoices is three years. This retention is adequate for bill disputes and bill reconciliation. The retention of 30 days referenced by KPMG refers to the lowest retention requirements for calls in files processed from one computer program to another to research calls not billed by BellSouth. If, during processing, the decision is made not to bill a call, it is not cost effective to retain files for the remote possibility that a CLEC would ever call to dispute this unbilled usage.

Functionality Issues	
Exception	Issue
16	The BellSouth Business Rules for Local Ordering-OSS '99, Issue9k, does not offer CLECs the ability to submit an order for the partial migration of a customer's unbundled (UNE) loops - BellSouth has provided a process through the use of LNP to allow end users to switch carriers and retain their existing telephone numbers, or to re-arrange their accounts before migration to another carrier. CLECs also have options on partial migrations of non-LNP loops through dividing an existing retail account, then migrating the divided account. These processes allow the CLEC an opportunity to serve these end users. This system functionality for partial migration of a non-LNP loop is currently in the Change Control Process and being prioritized by the CLECs.
42	The Telecommunications Access Gateway (TAG) interface does not accurately implement the end user information requirements contained in the BellSouth Business Rules for Local Ordering-OSS '99, Issue9l. BellSouth has provided access to the fully parsed address until the input for this portion of the LSR can be simplified. CLECs can simply populate the address until the edits are relaxed in TAG.
63	The BellSouth Electronic Communication Trouble Administration (ECTA) system failed to appropriately process 'enterTroubleReport' transactions. (TVV8) The ECTA system failed to process the enter trouble report transactions at a level satisfactory to the KPMG Consulting standard of 95%. On May 25, 2001, the number of communications paths to the LMOS system was increased by 2.5X. Should CLEC volumes increase, the number of communications paths can be increased as well. BellSouth implemented an enhancement to allow for identification of DPA (Different Premise Address) on 11/19/01 so KPMG is now retesting the issue.
74	The Robotag interface does not provide access to fields that are required for non-designed loop service disconnect (Reqtyp A / Act D), and for ISDN BRI resale service disconnect (REQTYP E / ACT D) requests. The RoboTAG interface does provide access to fields that are required for non-designed loop service disconnect (REQTYP A / ACT D), and for ISDN BRI resale service disconnect (REQTYP E / ACT D) requests. (TVV1). The processing steps were provided. BST can re-formulate fields so that the UNE Options screen is available when using Activity Type "D". Developers will include this option in a Robotag release that is scheduled for a 12/15/2001 implementation date.
98	BellSouth has transmitted Completion Notices (CN) using an incorrect Transaction Set via the Electronic Data Interchange (EDI) interface. Although the notices did not use the proper set, they were sent by BellSouth and received by KPMG; therefore, a CLEC would not be missing any information. BellSouth made the change to the correct Transaction Set, and KPMG has confirmed that they are now receiving the proper notices.
102	The Robotag interface fails to provide miscellaneous account numbers (MANS) for all cities in Florida. BellSouth's initial investigation found an anomaly that was identified as a result of the problems encountered by KPMG in their effort to reserve miscellaneous account numbers. The anomaly affected any city with a space in its name. A defect was opened, the software was revised, and the solution successfully tested. The perceived problem that occurred with the city of Chiefland, resulted from the lack of miscellaneous account numbers associated with that city. The problem KPMG experienced when attempting to reserve miscellaneous account numbers for the cities of Panama City Beach and Opa Locka, was due to the absence of those cities from the initial table used to verify city/state combinations. BellSouth has updated tables and provided instructions to address the issue. KPMG will retest this issue.

Florida Exceptions - Commercial Experience Measure			
FL Exception	Commercial Experience Measure		Benchmark/Analog
Ordering			
51, 54	O-8	<i>Reject Interval - Mechanized</i>	>= 97% w in 1 hr
85, 100	O-9	<i>FOC Timeliness - Mechanized</i>	>= 95% w in 3 hrs
90, 72, 105, 117	O-11	<i>FOC & Reject Response Completeness - Mechanized</i>	>= 95%
Provisioning			
76, 84, 112, 116	P-9	<i>% Provisioning Troubles within 30 Days</i> <i>Measure B-1 also applies to these Florida Exceptions</i>	Retail Analogs
Operations Support Systems			
87	OSS-2	<i>% Interface Availability - TAG</i>	>= 99.5%
38	OSS-3	<i>% Interface Availability - ECTA</i>	>= 99.5%
118	OSS-1	<i>Average Response Interval - CLEC (TAG)</i>	Parity plus 2 seconds
General - Flow Through			
86, 107, 121	O-3	<i>% Flow Through Service Requests</i>	>= 85%, 90% or 95%
Billing			
83	B-3	<i>Usage Data Delivery Accuracy</i>	Parity w Retail
13	B-5	<i>Usage Data Delivery Timeliness</i>	Parity w Retail
43, 44, 60, 96	B-1	<i>Invoice Accuracy</i>	BST - State
12	CM-5	<i>General - Change Management</i>	>= 97% w in 15 min